

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

REINALDO RAFAEL GONZALES-VALDEZ,
a/k/a "Marijuana,"
a/k/a "Marijuana,"
JOSE MANUEL GUERRERO-ZARATE,
a/k/a "Mantequilla,"
JOSE DAVID VALENCIA-DE LA ROSA,
JOHAN CARLOS MUJICA-URPIN,
a/k/a "Sobrino,"
LUIS JOSE VELASQUEZ-HURTADO,
a/k/a "Chito,"
STEFANO SAID PACHON-ROMERO,
GUILLERMO ENRIQUE FREITES-VELAZQUEZ,
JESUS DAVID BARRIOS GARCIA,
a/k/a "Morocho,"
GIOVANNY VALENTIN BLANCO LUCIANO,
a/k/a "Cachorrito,"
ANDERSON JESUS DURAN BERROTERAN,
a/k/a "Cachorro,"
ROIMAN NOE BELLO FERRER,
LUIS MIGUEL RODRIGUEZ-TAPIA,
MARIO ANDRES PEREDA,
a/k/a "Cara de Hombre,"
ANDERSON SMITH ZAMBRANO-PACHECO,
YEFERSON ALEJANDRO PRIETO GALVIZ,
a/k/a "Flaco T,"
a/k/a "Flacote,"
JHONKENNEDY BRAVO-CASTRO,
a/k/a "Negrito,"
YENDER MAYKIER MATA,
WILFREDO JOSE AVENDAÑO CARRIZALEZ,
a/k/a "Kabuvy,"
CARLOS GABRIEL SANTOS MOGOLLON,
KELLEN ALEJANDRO JASPE BUSTAMANTE, and
LUIS ANDRES BELLO-CHACON,
a/k/a "Care de Peo,"

Defendants.

**SEALED SUPERSEDING
INDICTMENT**

S1 25 Cr. 76 (MKV)

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

At all times relevant to this Indictment:

THE ANTI-TREN ENTERPRISE

1. REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” ROIMAN NOE BELLO FERRER, LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, and others known and unknown, were members and associates of the Anti-Tren Enterprise, an organization that operated throughout New York City, including in the boroughs of the Bronx and Queens, and in New Jersey, and elsewhere. Members and associates of the Anti-Tren Enterprise engaged in, among other activities, acts involving murder and assault, sex trafficking, human smuggling, trafficking of controlled substances, firearms trafficking, and robberies. The Anti-Tren Enterprise was almost exclusively

comprised of former members and associates of the Venezuelan transnational criminal organization Tren de Aragua or “TDA.”

2. The Anti-Tren Enterprise (“Anti-Tren” or the “Enterprise”), including its leaders, members, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. Anti-Tren constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of Anti-Tren.

3. REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Marijuana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” ROIMAN NOE BELLO FERRER, LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, were members and associates of Anti-Tren and participated in unlawful and other activities in furtherance of the conduct of Anti-Tren’s affairs.

PURPOSES OF THE ANTI-TREN ENTERPRISE

4. The purposes of Anti-Tren included the following:

a. Preserving and protecting the power and territory of Anti-Tren and its members and associates through acts involving murder, assault, other acts of violence, and threats of violence, including acts of violence and threats of violence directed at members and associates of Tren de Aragua.

b. Enriching the members and associates of Anti-Tren through, among other things, (i) the unlawful smuggling of individuals, including young women from Venezuela, into the United States, (ii) the sex trafficking of young women (whom members and associates of Anti-Tren often refer to as “multadas”) who had been unlawfully smuggled into the United States, (iii) the trafficking of controlled substances, principally a mixed substance called “tusi” that contains ketamine, and (iv) armed robberies.

c. Keeping victims and potential victims in fear of Anti-Tren and its members and associates through threats and acts of violence.

d. Promoting and enhancing Anti-Tren and the reputation and activities of its members and associates.

e. Providing assistance to members and associates of Anti-Tren who committed crimes for and on behalf of Anti-Tren, such as lodging and interstate transportation for members and associates of Anti-Tren to flee prosecution, or bail money for members or associates of Anti-Tren who are detained.

f. Protecting Anti-Tren and its members and associates from detection and prosecution by law enforcement authorities through acts of intimidation, threats, and violence against potential witnesses to crimes committed by members of Anti-Tren.

MEANS AND METHODS OF THE ANTI-TREN ENTERPRISE

5. Among the means and methods by which the members and associates conducted and participated in the conduct of the affairs of Anti-Tren were the following:

a. Members and associates of Anti-Tren committed and conspired, attempted, and threatened to commit, acts of violence, including acts involving murder and assault, to protect and to expand Anti-Tren's criminal operations, resolve disputes within Anti-Tren, and to retaliate against rival organizations, including Tren de Aragua.

b. Members and associates of Anti-Tren engaged in human smuggling and sex trafficking of young women they referred to as "multadas," whom Anti-Tren transported from Venezuela and other countries into the United States in exchange for debts that the "multadas" would pay back to Anti-Tren by engaging in commercial sex work in the United States. Members of Anti-Tren enforced compliance among "multadas" by, among other things, (i) threatening to kill "multadas" and their families, (ii) assaulting "multadas" (for example, by pistol-whipping them), (iii) shooting or killing "multadas," (iv) seizing United States immigration documents belonging to "multadas" and family members of "multadas," (v) tracking down and kidnapping "multadas" who tried to flee, and (vi) increasing the debts that the "multadas" owed. Members of Anti-Tren also sometimes raped and sexually assaulted "multadas."

c. Members and associates of Anti-Tren committed robberies.

d. Members and associates of Anti-Tren obtained, possessed, trafficked, and used firearms and ammunition.

e. Members and associates of Anti-Tren distributed and possessed with intent to distribute controlled substances, principally a mixed substance called "tusi" that contains ketamine.

THE RACKETEERING CONSPIRACY

6. From at least in or about 2022 through at least in or about 2025, in the Southern District of New York and elsewhere, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” ROIMAN NOE BELLO FERRER, LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, and others known and unknown, being persons employed by and associated with Anti-Tren, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of Anti-Tren through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which pattern of racketeering activity consisted of:

- a. multiple acts involving:
 - (i) murder, chargeable under the following provisions of New York State law: New York Penal Law, Sections 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);
 - (ii) robbery, chargeable under the following provisions of state law: New York Penal Law Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);
- b. multiple acts indictable under:
 - (i) Title 18, United States Code, Sections 1589 and 1590 (relating to forced labor and trafficking in forced labor);
 - (ii) Title 18, United States Code, Section 1591 (relating to sex trafficking by force, fraud, and coercion), and Title 18, United States Code, Section 1592 (relating to the destruction, concealment, removal, confiscation, and possession of immigration documents in the course of a violation of, and with intent to violate, Title 18, United States Code, Sections 1589, 1590, and 1591);
 - (iii) Title 18, United States Code, Section 933 (relating to trafficking in firearms);
 - (iv) Title 18, United States Code, Sections 1951 (relating to interference with commerce, robbery, or extortion) and 2 (aiding and abetting, and willfully causing);
 - (v) Title 18, United States Code, Section 1958 (relating to use of interstate commerce facilities in the commission of murder-for-hire); and

c. multiple offenses involving the distribution of controlled substances, including ketamine, chargeable under Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing);

7. It was a part of the conspiracy that REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” ROIMAN NOE BELLO FERRER, LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of Anti-Tren.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Sex Trafficking Conspiracy)

The Grand Jury further charges:

8. From at least in or about 2022 through at least in or about 2025, in the Southern District of New York and elsewhere, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,”

JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a "Sobrino," LUIS JOSE VELASQUEZ-HURTADO, a/k/a "Chito," STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a "Morocho," ANDERSON JESUS DURAN BERROTERAN, a/k/a "Cachorro," LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a "Cara de Hombre," ANDERSON SMITH ZAMBRANO-PACHECO, and JHONKENNEDY BRAVO-CASTRO, a/k/a "Negrito," the defendants, and others known and unknown, knowingly, in and affecting interstate commerce, combined, conspired, confederated, and agreed to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit, by any means, persons, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the persons to engage in commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a) and (b)(1), to wit, GONZALES-VALDEZ, GUERRERO-ZARATE, VALENCIA-DE LA ROSA, MUJICA-URPIN, VELASQUEZ-HURTADO, PACHON-ROMERO, FREITES VELAZQUEZ, BARRIOS GARCIA, DURAN BERROTERAN, RODRIGUEZ-TAPIA, PEREDA, ZAMBRANO-PACHECO, and BRAVO-CASTRO, and others known and unknown, agreed to recruit, entice, harbor, transport, provide and maintain young women from Venezuela (the "Victims") and cause the Victims to engage in commercial sex acts in the United States, including in the Bronx, New York, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion would be used to cause the Victims to engage in commercial sex acts.

(Title 18, United States Code, Section 1594(c).)

COUNT THREE
(Alien Importation and Harboring for Immoral Purpose - Conspiracy)

The Grand Jury further charges:

9. From at least in or about 2022 through at least in or about 2025, in the Southern District of New York and elsewhere, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, and JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, the illegal importation and harboring of aliens for prostitution or any other immoral purpose, in violation of Title 8, United States Code, Section 1328.

10. It was a part and object of the conspiracy that REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, and JHONKENNEDY BRAVO-CASTRO,

a/k/a “Negrito,” the defendants, and others known and unknown, would and did, directly and indirectly, import, and attempt to import into the United States one and more aliens for the purpose of prostitution and for any other immoral purpose, and did hold and attempt to hold one and more aliens for any such purpose in pursuance of such illegal importation, and did keep, maintain, control, support, employ, and harbor in any house or other place, for the purpose of prostitution and for any other immoral purpose, any alien, in pursuance of such illegal importation, in violation of Title 8, United States Code, Section 1328.

Overt Acts

11. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2024, JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” the defendant, caused an alien from Venezuela (“Woman-1”) to be maintained and harbored at a location in the Bronx, New York, so that Woman-1 could engage in prostitution for the benefit of GUERRERO-ZARATE and others.

b. In or about 2024, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” the defendant, caused another alien from Venezuela (“Woman-2”) to be maintained and harbored at a location in the Bronx, New York, so that Woman-2 could engage in prostitution for the benefit of BARRIOS GARCIA and others.

(Title 18, United States Code, Section 371.)

COUNT FOUR
(Drug Trafficking Conspiracy)

The Grand Jury further charges:

12. From at least in or about 2022 through at least in or about 2025, in the Southern District of New York and elsewhere, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

13. It was a part and an object of the conspiracy that REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

14. The controlled substance involved in the offense was a mixture and substance containing a detectable amount of ketamine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT FIVE
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

15. From at least in or about 2022 through at least in or about 2025, in the Southern District of New York and elsewhere, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Four of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, and aided and abetted the use, carrying, and possession of one or more firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT SIX
(Obstruction of Justice)
(LUIS JOSE VELASQUEZ-HURTADO)

The Grand Jury further charges:

16. On or about December 19, 2024 and January 17, 2025, in the Southern District of New York and elsewhere, LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” the defendant, corruptly obstructed, influenced, and impeded an official proceeding, and attempted to do so, to wit, VELASQUEZ-HURTADO attempted to bite law enforcement officers executing a premises search warrant so that they would be unable to access the contents of his cellphone and refused to comply with a judicial order to unlock the cellphone.

(Title 18, United States Code, Section 1512(c) and 2.)

COUNT SEVEN
(Unlicensed Dealing of Firearms)
(STEFANO PACHON-ROMERO)

The Grand Jury further charges:

17. Between in or about September 2024 and in or about December 2024, in the Southern District of New York and elsewhere, STEFANO PACHON-ROMERO, the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly engaged in the business of importing, manufacturing, and dealing in firearms, and in the course of such business shipped, transported, and received a firearm in interstate and foreign commerce, and aided and abetted the same, to wit, PACHON-ROMERO engaged in the business of dealing firearms without a license in the New York City area.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

COUNT EIGHT

**(Possession of a Firearm and Ammunition by a Fugitive from Justice and Illegal Alien)
(ANDERSON SMITH ZAMBRANO-PACHECO)**

The Grand Jury further charges:

18. From at least in or about November 2024 through at least in or about January 2025, in the Southern District of New York and elsewhere, ANDERSON SMITH ZAMBRANO-PACHECO, the defendant, knowing he was a fugitive from justice and an alien illegally and unlawfully in the United States, knowingly possessed and aided and abetted the possession of a firearm and ammunition, to wit, a Smith and Wesson Pro Series 9mm pistol and Maxxtech and Federal Cartridge 9mm ammunition, and the firearm and ammunition were in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(2) and (5), and 2.)

COUNT NINE

**(Possession of Firearms and Ammunition by an Illegal Alien)
(JHONKENNEDY BRAVO-CASTRO)**

The Grand Jury further charges:

19. In or about November 2024, in the Southern District of New York and elsewhere, JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” the defendant, knowing he was an alien illegally and unlawfully in the United States, knowingly possessed firearms and ammunition, and aided and abetted the same, to wit, BRAVO-CASTRO possessed and aided and abetted the possession of (a) a Glock Model 19 9mm pistol, (b) a STAG Arms Model Stag-15 rifle, (c) a DPMS rifle, (d) Speer ammunition, (e) G.F.L. ammunition, and (f) Tulammo ammunition, and the firearms and ammunition were in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(5) and 2.)

COUNT TEN

(Possession of a Firearm by an Illegal Alien)

**(WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS
MOGOLLON)**

The Grand Jury further charges:

20. On or about January 14, 2025, in the Southern District of New York and elsewhere, WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS MOGOLLON, the defendants, each knowing that he was an alien illegally and unlawfully in the United States, knowingly possessed and aided and abetted the possession of one or more firearms, to wit, a loaded Glock 9mm firearm and a loaded Taurus 9mm firearm, and the firearms were in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(5) and 2.)

FORFEITURE ALLEGATIONS

21. As a result of committing the offense alleged in Count One of this Indictment, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON JESUS DURAN BERROTERAN, a/k/a “Cachorro,” ROIMAN NOE BELLO FERRER, LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a “Cara de Hombre,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES

BELLO-CHACON, a/k/a "Care de Peo," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the offense alleged in Count One of this Indictment including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

22. As a result of committing the offense alleged in Count Two of this Indictment, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a "Mariguana," a/k/a "Marijuana," JOSE MANUEL GUERRERO-ZARATE, a/k/a "Mantequilla," JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a "Sobrino," LUIS JOSE VELASQUEZ-HURTADO, a/k/a "Chito," STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a "Morocho," ANDERSON JESUS DURAN BERROTERAN, a/k/a "Cachorro," LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a "Cara de Hombre," ANDERSON SMITH ZAMBRANO-PACHECO, and JHONKENNEDY BRAVO-CASTRO, a/k/a "Negrito," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594, any and all property, real and personal, involved in, used, or intended to be used to commit or to facilitate the commission of said offense; any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property traceable to

such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and proceeds traceable to the commission of said offense

23. As a result of committing the offense alleged in Count Three of this Indictment, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a "Mariguana," a/k/a "Marijuana," JOSE MANUEL GUERRERO-ZARATE, a/k/a "Mantequilla," JOSE DAVID VALENCIA-DE LA ROSA, JOHAN CARLOS MUJICA-URPIN, a/k/a "Sobrino," LUIS JOSE VELASQUEZ-HURTADO, a/k/a "Chito," STEFANO SAID PACHON-ROMERO, GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a "Morocho," ANDERSON JESUS DURAN BERROTERAN, a/k/a "Cachorro," LUIS MIGUEL RODRIGUEZ-TAPIA, MARIO ANDRES PEREDA, a/k/a "Cara de Hombre," ANDERSON SMITH ZAMBRANO-PACHECO, and JHONKENNEDY BRAVO-CASTRO, a/k/a "Negrito," the defendants, shall forfeit to the United States, pursuant to Title 8, United States Code, Section 1324(b) and Title 18 United States Code Section 982(a)(6), all conveyances, including any vessel, vehicle, or aircraft, used in the commission of said offense, and all property traceable to such conveyances; the gross proceeds of said offense, and all property traceable to such proceeds; all property, real and personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

24. As a result of committing the offense alleged in Count Four of this Indictment, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a "Mariguana," a/k/a "Marijuana," JOSE

MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

25. As a result of committing the offense alleged in Count Five of this Indictment, REINALDO RAFAEL GONZALES-VALDEZ, a/k/a “Mariguana,” a/k/a “Marijuana,” JOSE MANUEL GUERRERO-ZARATE, a/k/a “Mantequilla,” JOHAN CARLOS MUJICA-URPIN, a/k/a “Sobrino,” GUILLERMO FREITES VELAZQUEZ, JESUS DAVID BARRIOS GARCIA, a/k/a “Morocho,” GIOVANNY VALENTIN BLANCO LUCIANO, a/k/a “Cachorrito,” ANDERSON SMITH ZAMBRANO-PACHECO, YEFERSON ALEJANDRO PRIETO GALVIZ, a/k/a “Flaco T,” a/k/a “Flacote,” YENDER MAYKIER MATA, KELLEN ALEJANDRO JASPE BUSTAMANTE, and LUIS ANDRES BELLO-CHACON, a/k/a “Care de Peo,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to be used in said offense.

26. As a result of committing the offense alleged in Count Six of this Indictment, LUIS JOSE VELASQUEZ-HURTADO, a/k/a “Chito,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

27. As a result of committing the offense alleged in Count Seven of this Indictment, STEFANO PACHON-ROMERO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to be used in said offense.

28. As a result of committing the offenses alleged in Count Eight of this Indictment, ANDERSON SMITH ZAMBRANO-PACHECO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to be used in said offenses, including but not limited to: a Smith and Wesson Pro Series 9mm pistol with serial number UFB0037, including ammunition recovered therein.

29. As a result of committing the offense alleged in Count Nine of this Indictment, JHONKENNEDY BRAVO-CASTRO, a/k/a “Negrito,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to be used in said offense, including but not limited to: (a) a Glock Model 19 9mm pistol, (b) a STAG

Arms Model Stag-15 rifle, (c) a DPMS rifle, (d) Speer ammunition, (e) G.F.L. ammunition, and (f) Tulammo ammunition.

30. As a result of committing the offenses alleged in Count Ten of this Indictment, WILFREDO JOSE AVENDAÑO CARRIZALEZ and CARLOS GABRIEL SANTOS MOGOLLON, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in, used in, or intended to be used in said offenses, including but not limited to: (a) a loaded Glock 9mm firearm and (b) a loaded Taurus 9mm firearm.

31. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), and Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c),

to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 8, United States Code, Section 1324;
Title 18, United States Code, Sections 924(d), 981, 982, 1594, and 1963;
Title 21, United States Code, Section 853, and
Title 28, United States Code, Section 2461.)



FOREPERSON


MATTHEW PODOLSKY
Acting United States Attorney